

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 E-mail: jfoley@hkm.com

3 **MARTA D. KURSHUMOVA, ESQ.**

Nevada Bar No. 14728

4 E-mail: mkurshumova@hkm.com

**HKM EMPLOYMENT ATTORNEYS LLP**

5 1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

6 Tel: (702) 625-3893

7 Fax: (702) 625-3893

E-mail: jfoley@hkm.com

8 *Attorneys for Plaintiff*

9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 **PAULINA KLEIPS-SOTELO, an**  
13 **Individual**

14 **Plaintiff,**

15 **vs.**

16 **ABSOLUTE DENTAL &**  
17 **ORTHODONTICS PRADA, PLLC., a**  
18 **Domestic Professional Limited Liability**  
19 **Company, DOES I -X; ROE**  
20 **CORPORATIONS I -X.**

21 **Defendant.**

**CASE NO.: 2:20-cv-00021-KJD-DJA**

**ORDER EXTENDING TIME FOR**  
**PLAINTIFF TO FILE AND SERVE**  
**RESPONSE IN OPPOSITION TO**  
**MOTION TO DISMISS**

**(FIRST REQUEST)**

22 The parties, by and through their undersigned counsel, hereby stipulate and agree to  
23 the following:

24 1. On April 30, 2020, defendant filed its Motion to Dismiss (ECF 8).

25  
26 2. A Response in Opposition is currently due to be filed on May 14, 2020.

27  
28 3. The parties agree Plaintiff will have until May 28, 2020 to file and serve her

1 Response in Opposition to Defendant's Motion to Dismiss. This constitutes a fourteen  
2 (14) day extension.

3  
4 4. Plaintiff requests this extension to accommodate the schedule of her counsel who  
5 are currently working remotely due to the COVID-19 pandemic and who are engaged  
6 with upcoming deadlines in other matters, including an Early Neutral Evaluation  
7 before this Court on May 14, 2020. Accordingly, this request for an extension is made  
8 in good faith and not for the purposes of delay.

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25 ///

26 ///

27 ///

28 ///

1 5. This is the parties' first request for an extension of time related to this motion.

2  
3 Dated: May 13, 2020.

Dated: May 13, 2020

4  
5 **HKM EMPLOYMENT  
ATTORNEYS, LLP**

6 /s/ Jenny L. Foley  
7 **JENNY L. FOLEY, Ph.D., Esq.**

8 Nevada Bar No. 9017  
9 1785 East Sahara, Suite 300  
10 Las Vegas, Nevada 89104  
11 Tel: (702) 577-3029  
12 Fax: (702) 625-3893  
13 E-mail: [jfoley@hkm.com](mailto:jfoley@hkm.com)

14 *Attorney for Plaintiff*

**LITTLER MENDELSON**

/s/ Amy L. Thompson  
**WENDY M. KRINCEK, Esq.**

Nevada Bar No. 6417  
**AMY L. THOMPSON, Esq.**

Nevada Bar No. 11907  
3960 Howard Hughes Pkwy.  
Suite 300  
Las Vegas, Nevada 89169  
Tel: (702) 862.8800  
Fax: (702) 862.8811

E-mail: [wkrincek@littler.com](mailto:wkrincek@littler.com)  
[athompson@littler.com](mailto:athompson@littler.com)

*Attorneys for Defendant*

15  
16  
17 **ORDER**

18 **IT IS SO ORDERED:**

19 

20  
21 UNITED STATES  
22 DISTRICT JUDGE

5/14/2020

DATE